

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PRIORITIES USA,RISE, INC., and
DETROIT/DOWNRIVER CHAPTER
OF THE A. PHILIP RANDOLPH
INSTITUTE,

Plaintiffs,

v.

DANA NESSEL,

Defendant,

and

MICHIGAN HOUSE OF
REPRESENTATIVES, MICHIGAN
SENATE, MICHIGAN REPUBLICAN
PARTY, and REPUBLICAN
NATIONAL COMMITTEE,

Intervenors–Defendants.

Civil No. 19-13341

HON. STEPHANIE DAWKINS
DAVIS
MAG. KIMBERLY G. ALTMAN

**STIPULATED MOTION TO
EXTEND DEADLINE**

STIPULATED MOTION TO EXTEND DEADLINE

The undersigned counsel for Plaintiffs, Defendants, and the Intervenor-Defendants (the “Parties”) hereby stipulate to an extension of the expert deposition deadline set by the Court’s November 19, 2021 Order, ECF No. 131.

As grounds for this Motion, the Parties state the following in support of modifying the existing deadlines:

1. The Parties have been diligently pursuing discovery. The Parties have served and responded to document requests and interrogatories.

2. Plaintiffs served an expert report by Dr. Michael Herron on December 17, 2021. Intervenor-Defendants served an expert report by Kimberly Strach on January 14, 2022.

3. The discovery schedule sets expert depositions for January 31 through February 4, 2022, with discovery closing on February 4, 2022. Dr. Herron will be testifying in trial the week of January 31, 2022. The schedule for this trial had been uncertain until recently, particularly in light of the COVID-19 pandemic. The Parties therefore agree to hold his deposition on February 7, 2022. The Parties also agree to depose Ms. Strach on February 9, 2022.

4. The Parties therefore request to move the deadline to complete discovery to February 10, 2022. The Parties do not request an extension of any other deadlines.

5. As required by R12 of the Eastern District of Michigan's Electronic Filing Policies and Procedures, the Parties include a Proposed Order with this filing.

Date: January 28, 2022

Respectfully submitted,

s/Amanda Beane

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ORDER

In consideration of the Parties' Stipulated Motion to Extend Deadline, the Court hereby amends its November 19, 2021 Order, ECF No. 131, and extends the expert deposition deadline through February 9, 2022.

IT IS SO ORDERED

DATED: February 2, 2022

s/Stephanie Dawkins Davis
Stephanie Davis Dawkins
United States District Judge